

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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In re	:	Chapter 13
IRIS RIVERA	:	
	:	Case No. 24-10228
Debtor(s).	:	
	:	
	:	

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DEBTOR’S MOTION TO EXTEND THE AUTOMATIC STAY

Iris Rivera ("**Movant**"), hereby moves this Court ("**Motion**") to extend the automatic stay under 11 U.S.C. § 362(a) as to all creditors pursuant to 11 U.S.C. § 362(c)(3)(B). In support of this motion, the Movant respectfully represents the following:

1. Debtors filed a voluntary petition for relief under Chapter 13 of the Bankruptcy Code on January 25, 2024.
2. Debtors previously filed a Chapter 13 case on March 23, 2023, and the case was assigned case number 23-10832 ("**Prior Case**"). The Prior case was dismissed on September 1, 2023 for failure to make required plan payments.
3. At the time of the dismissal of the Debtor's Prior Case, substantial expenses were incurred for the repair and remediation of a roof leak. This situation led to the Debtor falling behind in fulfilling her obligations to the trustee.
4. The Debtor had anticipated that an augmentation in her Social Security benefits, intended for her disabled children, would assist in offsetting these costs. Unfortunately, this increase did not materialize promptly. Consequently, the Debtor's Prior Case was dismissed for failure to make plan payments.
5. Presently, the Debtor's income has stabilized as she now receives augmented Social Security benefits for her children as well as a \$400 contribution from a family member. These combined increases furnish the debtor with adequate disposable income to fulfill her obligations to creditors.
6. The Debtor believes no parties shall be aggrieved upon the granting of this Motion.

WHEREFORE, Debtors request that this Court continue the automatic stay under §362(a) as to all creditors for the duration of this Chapter 13 proceeding, or until such time as the stay is terminated under §362(c)(1) or (c)(2), or a motion for relief is granted under § 362(d).

/s/Paul H. Young
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